

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

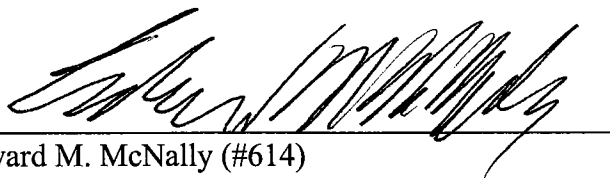
ELBERTA BERNICE LIEBERMAN,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 96-523-GMS
)	
THE STATE OF DELAWARE,)	
THE FAMILY COURT OF THE)	
STATE OF DELAWARE)	
)	
Defendant.)	

**PLAINTIFF ELBERTA BERNICE LIEBERMAN'S
PROPOSED SPECIAL VOIR DIRE QUESTIONS**

Pursuant to Rule 47.1(a) of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, in addition to the Court's standard questions, Plaintiff Elberta Bernice Lieberman requests that the Court ask prospective jury members the following questions:

1. Have you or an immediate family member ever been sued for violating the Americans with Disabilities Act, the Rehabilitation Act, or otherwise been sued for employment discrimination? If so please identify the person sued, the nature of your relationship to the person sued, and the nature of the claim.
2. Have you ever known anyone who suffered from a debilitating mental illness? If so please identify your relationship with that person, and the nature of the illness.

MORRIS, JAMES, HITCHENS & WILLIAMS LLP

A handwritten signature in black ink, appearing to read 'Edward M. McNally', is written over a horizontal line.

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